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UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

This Document Relates To:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

**JOINT ADMINISTRATIVE MOTION ON  
CASE SCHEDULE**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

The parties hereby submit this joint administrative motion concerning the scheduling order in this case. *See* Case Management Order (“CMO”) No. 10 Including Pretrial Order (ECF 604). Having met and conferred extensively, the parties agree that, to facilitate the completion of necessary fact and expert discovery and to best prepare these cases for trial, good cause exists to extend the period currently allocated for fact discovery by approximately four months, and to extend the period currently allocated for expert discovery by approximately two months. Under the parties’ proposed changes to the existing scheduling order, the trial date would be extended by six months, from October 14, 2025 to April 14, 2026, subject to the Court’s calendar, availability, and preference. Given that the current deadline for the substantial completion of document productions is shortly after the next Case Management Conference (“CMC”) set for September 13<sup>th</sup>, the parties are available via videoconference to address

their proposed extension with the Court at its convenience.<sup>1</sup>

Accordingly, pursuant to Rule 16(b)(4) and Local Rule 16, the parties respectfully and jointly request that the schedule entered by the Court in CMO No. 10 be modified as follows:<sup>2</sup>

<b>Pretrial Event</b>	<b>Date per CMO 10</b>	<b>Proposed Date</b>
Substantial Completion of Document Production	September 20, 2024 <sup>3</sup>	November 5, 2024
Close of Fact Discovery	December 20, 2024	May 2, 2025
Joint Status Report on Protocol for Production of Expert-Related Documents	January 13, 2025	May 19, 2025
Non-Case-Specific and Causation Experts: Plaintiffs' Opening Reports	January 31, 2025	June 20, 2025
Case-Specific Experts: Plaintiffs' Opening Reports	January 31, 2025	June 23, 2025
Identification of Bellwether Trial Pools	February 6, 2025 at 12:00 PM	June 27, 2025
Hearing re Identification of Bellwether Trial Pools	February 10, 2025 at 1:00 PM	July 11, 2025 <sup>4</sup>
Non-Case-Specific and Causation Experts: Defendants' Responsive Reports	February 28, 2025	August 13, 2025
Case-Specific Experts Defendants' Responsive Reports	March 3, 2025	August 15, 2025
Non-Case-Specific and Causation Experts: Plaintiffs' Rebuttal Reports	March 14, 2025	September 3, 2025
Case-Specific Experts Plaintiffs' Rebuttal Reports	March 17, 2025	September 5, 2025
Close of Expert Discovery	April 7, 2025	October 8, 2025
Exchange Preliminary Witness Lists	April 21, 2025	October 22, 2025

<sup>1</sup> The parties advised Magistrate Judge Kang at the August 8<sup>th</sup> Discovery Management Conference that they were discussing a possible extension and had planned to raise it with Your Honor at the CMC previously set for August 9<sup>th</sup>, prior to its vacatur.

<sup>2</sup> The JCCP Plaintiffs have agreed to a corresponding extension until May 2, 2025 for the close of fact discovery in the JCCP proceeding (and a December 6, 2024 deadline for the substantial completion of document production in that proceeding), but defer to Judge Kuhl to set other JCCP-specific pre-trial deadlines and trial schedules. To date, no pre-trial schedules or trial dates are set in the JCCP. Judge Kuhl has ordered the parties in the JCCP to present competing schedules for trials and certain pre-trial deadlines at the August 29, 2024 JCCP CMC. The JCCP parties' proposals would account for any extended fact discovery period granted by this Court.

<sup>3</sup> This date is not provided for in CMO No. 10 but, rather, is set forth in Discovery Management Order No. 2 (ECF 606) at page 3.

<sup>4</sup> This and the other suggested hearing dates in the parties' proposed schedule are suggested dates only; the parties defer to the Court's calendar, availability, and preferences for scheduling.

Exchange Preliminary Proposed Jury Instructions	May 2, 2025	November 3, 2025
Deadline to Meet and Confer Regarding Whether Any Additional and Unanticipated Discovery May Be Needed on Disclosed Witnesses and to Develop a Plan for Completing Any Agreed-Upon Additional Discovery	May 2, 2025	November 3, 2025
Submit Joint Status Report on Results of Meet and Confer on Additional and Unanticipated Discovery on Disclosed Witnesses	May 5, 2025	November 5, 2025
Dispositive and Rule 702 ( <i>Daubert</i> ) Motions: Opening Briefs	May 7, 2025	November 5, 2025
Submit Joint Letter Brief on Any Remaining Discovery Disputes on Disclosed Witnesses	May 9, 2025	November 10, 2025
File Proposed / Disputed Jury Instructions and Additional Questions for Juror's Survey Monkey Questionnaire	May 30, 2025	December 15, 2025
Dispositive and Rule 702 ( <i>Daubert</i> ) Motions: Opposition Briefs	June 4, 2025	December 15, 2025
Dispositive and Rule 702 ( <i>Daubert</i> ) Motions: Reply Briefs	June 18, 2025	January 20, 2026
Hearing on Order in which Bellwether Cases Will Be Tried	June 27, 2025 at 9:00 AM	January 28, 2026
Dispositive and Rule 702 ( <i>Daubert</i> ) Motions: Hearing	July 16, 2025 at 2:00 PM	February 13, 2026
Exchange of Initial Pretrial Disclosures per the Court's Standing Order	September 5, 2025	March 10, 2026
Submit Joint Statement Regarding Pretrial Meet and Confer Compliance	September 5, 2025	March 10, 2026
Compliance Deadline	September 12, 2025 at 9:01 AM	March 17, 2026
Joint Trial Submissions per the Court's Standing Order	September 18, 2025	March 23, 2026
Pretrial Statement	September 26, 2025	March 23, 2026
Pretrial Conference	October 3, 2025 at 9:00 am	April 7, 2026
Jury Selection and Start of Trial	October 14, 2025 at 8:00 am	April 14, 2026

1 Respectfully submitted,

2 DATED: August 22, 2024

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**ATTESTATION**

I, Previn Warren, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: August 21, 2024

By: /s/ Previn Warren